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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,
 JEREMY DAVIS, CHRISTOPHER
 CASTILLO, and MONIQUE TRUJILLO
 individually and on behalf of all similarly
 situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

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Case No.: 5:20-cv-03664-LHK

**[PROPOSED] ORDER GRANTING
 PLAINTIFFS' MOTION SEEKING
 RELIEF FOR GOOGLE'S FAILURE TO
 OBEY DISCOVERY ORDER**

The Honorable Susan van Keulen
 Courtroom 6 - 4th Floor
 Date: November 23, 2021
 Time: 10:00 a.m.

[PROPOSED] ORDER

Before the Court is Plaintiffs' Motion Seeking Relief for Google's Failure to Obey Discovery Order (the "Motion"). Having considered the parties' papers filed in support of and in opposition to the Motion, and other papers on file, and good cause having been shown, the Court **ORDERS** as follows:

Plaintiffs' Motion is granted.

The Court concludes that Google failed to comply with the Court's April 30 Discovery Order (Dkt. 147-1).

Within one week of this Order, Google must search for and produce (1) all identifiers within Google's possession, custody, or control that are associated with Plaintiffs or their devices and (2) all data in Google's possession, custody, or control linked to all identifiers associated with the named Plaintiffs or their devices, including without limitation IP addresses. Google may not limit this production on the basis of Google's views on whether such identifiers or data are "authenticated" or "unauthenticated" or whether the data is linked or linkable to Plaintiffs or their devices. Within two weeks of this Order, the parties shall provide a joint update to the Court regarding that production and any issues regarding the case schedule.

If Google does not search for and produce the identifiers and data required by this Order, then the Court will take as established for purposes of this action that all of Google's so-called "unauthenticated" data is linked or linkable to users. This includes all private browsing information Google collected during the class period. Google will also be precluded from presenting any arguments in this case concerning whether such data is linked or linkable to Plaintiffs and other class members. This Order applies without limitation to Plaintiffs' anticipated motion for class certification, any summary judgment motions, and trial.

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IT IS SO ORDERED.

DATED: _____

Honorable Susan van Keulen
United States Magistrate District Judge